

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DREW MACEWEN, ANDREW BARKIS,
CHRIS CORRY, BRANDON VICK, KELLY
CHAMBERS, MICHAEL MCKEE, FRAN
WILLS, BRUCE RUSSELL, Phil Fortunato,
Dave McMullan, Isaac Vellekamp, and Marcus
Torrey,

Plaintiffs,

v.

JAY INSLEE, in my official capacity as the
Governor of Washington,

Defendant.

No. 3:20-cv-05423

DECLARATION OF MICHAEL MCKEE

I, Michael McKee, make the following declaration under penalty of perjury:

1. I am a plaintiff in the above-entitled action and have personal knowledge of the facts stated herein.
2. I am a resident of Washington.
3. I also own a catering business in Washington state.
4. My catering business normally services events such as weddings and business conferences.
5. As a result of the Proclamations, most of the events that are normally serviced by my catering business are cancelled.
6. Because my catering business has almost no remaining clients, it has been functionally bankrupted.

- 1 7. I have been deprived of most of my income from my catering business.
- 2 8. But for the Proclamations, I would still be earning a significant income from my catering
- 3 business.
- 4 9. I also own a shop in Washington state.
- 5 10. My shop is still under construction.
- 6 11. I am unable to finish constructing my shop as a result of the Proclamations.
- 7 12. But for the Proclamations, I would be finishing the construction of my shop.
- 8 13. I am also an avid shooter.
- 9 14. I normally hone my abilities at a local gun range.
- 10 15. My local gun range is closed as a result of the Proclamations.
- 11 16. I normally purchase gun parts and ammunition at my local gun shop.
- 12 17. My local gun shop is closed as a result of the Proclamations.
- 13 18. But for the Proclamations, I would be free to exercise my Second Amendment right to bear
- 14 arms.
- 15 19. I am deprived of my Second Amendment right to bear arms due to the Proclamations.
- 16 20. I also normally attend church in Washington state.
- 17 21. I and my fellow congregants are Bible-believing Christians who are compelled, as a matter of
- 18 religious conscience, to “not forsak[e] the assembling of ourselves together” in physical,
- 19 corporate worship. Hebrews 10:25 (KJV).
- 20 22. My church is closed as a result of the Proclamations.
- 21 23. But for the Proclamations, my church would be open.
- 22 24. I am deprived of the ability to worship at church due to the Proclamations.
- 23 25. I am moreover deprived of the ability to fulfil a critical religious obligation due to the
- 24 Proclamations.
- 25 26. I am also deprived of the fellowship I normally enjoy at church due to the Proclamations.
- 26 27. I also have family, friends, and coworkers in Washington state.
- 27 28. I normally socialize with my family, friends, and coworkers on a regular basis.

1 29. Social events have been banned as a result of the Proclamations.

2 30. But for the Proclamations, I would be socializing regularly with my family, friends, and
3 coworkers.

4 31. I am deprived of the ability to socialize with my family, friends, and coworkers due to the
5 Proclamations.

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7 SIGNED, May 19, 2020, at Quincy, Washington.

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10 BY: 

11 MICHAEL MCKEE
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